

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION
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ZBIGNIEW DOBRONSKI,

06CV11533

Plaintiff,

-against-

ANSWER TO
AMENDED
COMPLAINT

111 WALL STREET LLC, 222 BROADWAY, LLC,
230 CENTRAL CO., LLC, 55 WATER STREET CONDOMINIUM,
90 CHURCH STREET LIMITED PARTNERSHIP,
ALAN KASMAN DBA KASCO, AMBIENT GROUP, INC.,
ANN TAYLOR STORES CORPORATION,
BANKERS TRUST COMPANY,
BATTERY PARK CITY AUTHORITY, BELFOR USA
GROUP, INC., BLACKMON-MOORING- STEAMATIC
CATASTROPHE, INC. D/B/A BMS CAT,
BOARD OF MANAGERS OF THE HUDSON VIEW EAST
BOSTON PROPERTIES, INC., BROOKFIELD FINANCIAL
PROPERTIES, LP, BROOKFIELD PARTNERS, LP,
BROOKFIELD PROPERTIES CORPORATION,
BROOKFIELD PROPERTIES HOLDINGS INC.,
BT PRIVATE CLIENTS CORP., CHASE MANHATTAN BANK
CORPORATION, CITIBANK, NA, CITIGROUP, INC., CUSHMAN
AND WAKEFIELD 111 WALL, INC., CUSHMAN AND WAKEFIELD,
INC., DEUTSCHE BANK TRUST COMPANY, DEUTSCHE BANK
TRUST COMPANY AMERICAS, DEUTSCHE BANK TRUST
CORPORATION, ENVIROTECH CLEAN AIR, INC.,
GPS ENVIRONMENTAL CONSULTANTS, INC.,
HARRAH'S OPERATING COMPANY, INC., HILLMAN ENVIRONMENTAL
GROUP, LLC, HILTON HOTELS CORPORATION, HUDSON VIEW
EAST CONDOMINIUM, HUDSON VIEW TOWERS ASSOCIATES,
INDOOR ENVIRONMENTAL TECHNOLOGY, INC., KASCO
RESTORATION SERVICES CO., LIBERTY VIEW ASSOCIATES,
L.P., MERRILL LYNCH & CO, INC., NEW WATER STREET CORP.,
NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES
INTERNATIONAL, INC., RY MANAGEMENT CO., INC., RELATED
BPC ASSOCIATES, INC., RELATED MANAGEMENT CO., LP,

RY MANAGEMENT, STATE STREET BANK AND TRUST COMPANY, AS OWNER AND TRUSTEE OF ZSF/ OFFICE NY TRUST, STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., SWISS BANK CORPORATION, THE BANK OF NEW YORK TRUST COMPANY NA, THE RELATED COMPANIES, LP, THE RELATED REALTY GROUP, INC., TISHMAN INTERIORS CORPORATION, TISHMAN SPEYER PROPERTIES, TOSCORP INC., TULLY CONSTRUCTION CO., INC., TULLY INDUSTRIES, INC., V CUCINIELLO, WESTON SOLUTIONS, INC., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, WFP TOWER B. CO., L.P., WFP TOWER D CO. G.P. CORP., WFP TOWER D HOLDING CO. I L.P., WFP TOWER D HOLDING CO, II L.P., WFP TOWER D HOLDING I G.P. CORP., AND WFP TOWER D. CO., L.P., ET AL

Defendants.

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PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Amended Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
March 13, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
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BY: 
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